BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Modernize the Electric Grid for a High Distributed Energy Resources Future.	Rulemaking 21-06-017 (Filed June 24, 2021)

RESPONSE OF THE MOBILITY HOUSE TO ASSIGNED COMMISSIONER'S RULING SEEKING ADDITIONAL INFORMATION ON DER ENABLED NEAR TERM FLEXIBLE CONNECTIONS

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In accordance with Rule 6.2 of the Rules of Practice and Procedure of the California Public Utilities Commission ("The Commission") The Mobility House ("TMH") respectfully submits this response to the November 3, 2025 *Assigned Commissioner's Ruling ("ACR") Seeking Additional Information on Distributed Energy Resources ("DER") Enabled Near Term Flexible Connections* from and the November 19, 2025 *Email Ruling Modifying Party Response Date*.

28. Should existing and new customers utilizing variable or dynamic operating envelopes be required to enroll in dynamic rate pilots, when available in their territory, and then be defaulted to dynamic rates when the pilots are no longer available? Please provide rationale for your response.

TMH recognizes that as discussed in the ACR, customers working with variable or dynamic operating envelopes may in theory have more flexibility in their charging schedules than those working with a fixed limit.[1] TMH also agrees that flexible connections as they currently exist address only a single type of grid constraint, and that dynamic rates allow customers to react to a range of grid and energy ecosystem conditions.[2] Flexible connections also clearly fill a gap in the capability of dynamic rates to communicate locationally-specific grid infrastructure conditions in a manner that causes a sufficiently-reliable response that utilities can base infrastructure planning decisions on it. In theory these two mechanisms could be a more complete (and non-duplicative) price signal than either is on its own.

Industry stakeholders have long advocated for stackable value streams in California and dynamic rates combined with flexible connections could be a good example of non-duplicative values that should be an option to stack. That said, TMH believes dynamic rates should remain opt-in for flexible connections customers to take advantage of if that is possible and practical for their fleet.

TMH has been coordinating charging of EV fleets in constrained infrastructure conditions in both the EU and the US for years and has deep experience in assessing the charging schedule flexibility of both general market segments and specific individual fleet customers. Both dynamic rates and flexible connections assume there is flexibility available in a customer's charging schedule. While TMH agrees the Commission should be incentivizing customers to stack these values if possible, TMH urges the Commission not to assume there will always be sufficient flexibility in charging profiles to respond to both types of constraints/price signals. Even fleets with long dwell times and short driving routes need time to move the required kWh for fleet operations into their batteries. In highly constrained conditions, for example, where a flexible connection of some type still results in zero charging capacity available for more than 12 hours each day, the ability of a customer to respond to any other price signal during the period when charging is possible

[1] Assigned Commissioner's Ruling Seeking Additional Information on DER Enabled Near Term Flexible Connections in R.21-06-017, November 3, 2025. Page 20.
[2] Ibid.

may be limited or non-existent. Making both signals compulsory to access expedient energization options could result in new usage peaks at unforeseen times even as customers avoid the classic "timer-spike" of a traditional time-of-use rate, or in an increase in customers who decline to electrify for fear they will be unable to charge their fleets under the proposed conditions.

The Commission can take a tangible step forward by considering opt-in stacking of dynamic rates with flexible connections. *Requiring* stacking runs the risk of disincentivizing customers from taking advantage of either by requiring both.

Respectfully Submitted,

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